



(USA and )  
Jamal Elhaj-Chehade  
Co- plaintiff

Vs.

Educational Commission for Foreign Medical Graduates  
( entities and individuals) defendants

3:01-CV-01301-L

**Plaintiff's response to the defendant's filing of the Status report, and cross motion  
for a settlement conference before judge**

**January,7, 2002**

Comes now on this date, the plaintiff is his filing his response to the defendants filing of the status report as follow:

- 1- The plaintiff objects to the style and the defendants arguments presented. The plaintiff denies that this case is not subject to settlement. The plaintiff is demanding that a settlement conference be conducted under the auspice of judge( or judges) in which each party presents his evidences and arguments , what and why. Etc..
- 2- The plaintiff rejects that the defendants ECFMG claims. The plaintiff reaffirms his position that the ECFMG is a placement agency and that the ECFMG admitted to such a fact in income tax filings 1994-1999(prototype 1997) and in its own directories( prototype 1997 and 2001) and if the defendants or this court doubt such facts the plaintiff is willing to submit the evidences anytime and during the scheduled conference. The ECFMG admitted in its own directories( 1997 version) in its aims and mission that the ECFMG will engage in developing and creating programs and opportunities with other third parties. But the defendants practices of deliberately recruiting temporary workers( Price fixing) under visa programs thus displacing and deliberately denying the plaintiff. The plaintiff stands firm under penalty of perjury.
- 3- The defendants admitted to every element of every claim brought against them in their income tax filings and directories. And the plaintiff does not see any reason why this court keep covering up for the defendant.
- 4- The defendants admitted to be under 503( C ) ( 3 ) , which means that the defendants are obligated every year to contribute a minimum of sixty percent of their gross income( revenues before any deduction as taxes and expenses...) on the cause( the plaintiff) for which the defendants exist. So far the plaintiff denies the receipt of any aid from the defendants for which the plaintiff is entitled for relief for life.